

ESTTA Tracking number: **ESTTA708247**

Filing date: **11/12/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91197089
Party	Plaintiff Los Angeles Dodgers, LLC
Correspondence Address	DON M OBERT COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036-6799 UNITED STATES sis@cll.com, trademark@cll.com, jmn@cll.com, mlk@cll.com, dmo@cll.com, rsm@cll.com, lmr@cll.com
Submission	Other Motions/Papers
Filer's Name	Lindsay M. Rodman
Filer's e-mail	trademark@cll.com, jmn@cll.com, lmr@cll.com
Signature	/Lindsay Rodman/
Date	11/12/2015
Attachments	BROOKLYN BURGER Motion to Suspend 11.14.15.pdf(99385 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 77/750,645
Filed: June 3, 2009
For Mark: BROOKLYN BURGER (Stylized)
Published in the Official Gazette: April 27, 2010

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LOS ANGELES DODGERS, LLC,	:
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Opposer,	:
	:
v.	:
	:
	Opposition No. 91197089
	:
A. STEIN MEAT PRODUCTS, INC.,	:
	:
Applicant.	:
	:
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MOTION ON CONSENT TO EXTEND DEADLINES

Opposer, with the consent of Applicant's counsel, hereby requests that the Deadline for Initial Disclosures and all remaining dates be extended for sixty (60) days.

The parties have nearly completed settlement in this matter. On August 24, 2015, Opposer's outside counsel sent execution copies of the settlement agreement via FedEx courier to Applicant's counsel. Subsequently, the parties had additional discussions regarding a substantive provision of the agreement. Finally, on November 10, 2015 the agreement was fully executed.

The parties respectfully request an additional sixty (60) day extension of the deadlines to allow Applicant's counsel to execute a motion pursuant to the agreement and to allow the Board to act on the motion. The parties respectfully request that the deadlines be extended as follows:

Initial Disclosures Due:	1/13/2016
Expert Disclosures Due :	5/12/16
Discovery Period to Close :	6/11/16
Plaintiff Pretrial Disclosures :	7/27/16
Plaintiff's 30-day Trial Period Ends :	9/9/16
Defendant/Counterclaim Plaintiff's Pretrial Disclosures :	9/24/16
30-day Trial Period for Defendant and Plaintiff in the Counterclaim :	11/8/16
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due :	11/23/16
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends:	1/7/17
Counterclaim Plaintiff's Rebuttal Disclosures Due:	1/22/17
15-day Rebuttal Period for Counterclaim Plaintiff Ends :	2/21/17
Plaintiff's Trial Brief Due :	4/27/17
Defendant's Trial Brief and Plaintiff in the Counterclaim Due :	4/24/17
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due :	6/21/17
Reply Brief, if any, for Plaintiff in the Counterclaim Due :	7/7/17

If the Board grants this motion, the Board should reset the trial periods and other periods as outlined above.

Dated: New York, New York
November 12, 2015

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Lindsay Rodman/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on November 12, 2015, I caused a true and correct copy of the foregoing Motion on Consent to Extend Deadlines to be sent via First Class Mail, postage prepaid, to Applicant's Attorney and Correspondent of Record, Robert T. Maldonado, Esq., Cooper & Dunham LLP, 30 Rockefeller Plaza, New York, New York 10012.

New York, New York
Dated: November 12, 2015

/Lindsay Rodman/
Lindsay M. Rodman